

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER and
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., et al.,

Defendants.

Case No. 1:21-cv-11181-PBS

**DEFENDANT STEVE WYMER’S UNOPPOSED MOTION TO UNSEAL
DKT. NOS. 705-1, 706-3 AND 706-4**

Defendant Steve Wymer hereby moves to unseal the following documents previously filed under seal: (1) Wymer’s Supplemental Memorandum in Support of his Motion for Summary Judgment (Dkt. No. 705-1) (the “Supplemental Memorandum”); (2) Exhibit 1 to the Declaration of Trevor N. Templeton in Support of Wymer’s Supplemental Memorandum (Dkt. No. 706-3); and (3) Exhibit 2 to the Declaration of Trevor N. Templeton in Support of Wymer’s Supplemental Memorandum (Dkt. No. 706-4) (collectively, the “Sealed Documents”). Wymer’s counsel gave written notice to all parties of this motion to unseal and offered to meet and confer with any party that opposed. PFC responded that it had no objection to the motion. The other parties did not raise any objections to this motion.

As grounds for this motion, Wymer states as follows:

1. On July 9, 2025, Jim Baugh’s counsel designated the transcript of Baugh’s deposition and associated exhibits as Confidential in their entirety under the Protective Order.
2. On July 15, 2025, the Court ordered that “[t]he exhibits and transcripts shall be filed under seal, but shall be redacted and filed publicly for non-confidential material.” Dkt. No. 696.

3. On July 16, 2025, Wymer filed his Supplemental Memorandum and supporting materials, including two exhibits containing excerpts of the portions of Baugh's deposition transcript that were cited in the Supplemental Memorandum. Pursuant to the Court's July 15, 2025 Order, Wymer filed the Sealed Documents under seal (*see* Dkt. Nos. 705-1, 706-3, 706-4) and publicly filed redacted versions of the same documents (*see* Dkt. Nos. 705, 706-1, 706-2).

4. On July 18, 2025, the Court ordered that "[o]nly those portions of the deposition relied on by the parties shall be made public unless otherwise deemed confidential." Dkt. No. 710.

5. On August 12, 2025, Wymer requested that Baugh de-designate certain testimony cited in Defendants eBay's, Devin Wenig's, Wendy Jones', and Wymer's supplemental briefs. On August 18, 2025, Baugh's counsel expressed that he had no objection to the public filing of such testimony. As a result, there is no longer any basis to keep the Sealed Documents under seal, as they do not contain any information deemed Confidential.

6. Thus, in accordance with the Court's July 18, 2025 Order, Wymer respectfully requests that the Court unseal the Sealed Documents.

7. As discussed, Wymer's counsel gave written notice to all parties (including Baugh) of this motion to unseal and offered to meet and confer with any party that opposed. PFC responded that it had no objection to the motion. The other parties did not raise any objections to this motion.

* * *

WHEREFORE, Wymer respectfully requests that the Court allow this motion to unseal the Sealed Documents and direct the Clerk of Court to unseal Dkt. Nos. 705-1, 706-3 and 706-4.

Respectfully submitted,

STEVE WYMER,

By his Attorneys,

s/ *Caz Hashemi*

Caz Hashemi, Esq. (*pro hac vice*)

WILSON SONSINI GOODRICH & ROSATI,
P.C.

650 Page Mill Road

Palo Alto, CA 94304

(650) 493-9300

chashemi@wsgr.com

Melissa Mills, Esq. (*pro hac vice*)

Trevor Templeton, Esq. (*pro hac vice*)

WILSON SONSINI GOODRICH & ROSATI,
P.C.

953 East Third Street, Suite 100

Los Angeles, CA 90013

(323) 210-2900

mmills@wsgr.com

ttempleton@wsgr.com

Lon F. Povich (BBO 544523)

ANDERSON & KREIGER LLP

50 Milk Street, 21st Floor

Boston, MA 02109

(617) 621-6578

lpovich@andersonkreiger.com

Dated: August 22, 2025

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Pursuant to Local Rule 7.1(a)(2), the undersigned counsel certifies that counsel for Mr. Wymer conferred with counsel for all parties and *pro se* parties regarding this motion, who did not raise any objections to the relief requested in this motion.

Dated: August 22, 2025

/s/ Caz Hashemi
Caz Hashemi

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Caz Hashemi
Caz Hashemi